



AMERICAN FEED INDUSTRY ASSOCIATION

April 7, 2006

The National Organic Standards Board  
c/o Ms. Valerie Frances  
Room 4008 South Building  
1400 and Independence Avenue, SW  
Washington DC 20250-0001

Re: NOSB-Aquaculture Working Group's Interim Final Report

Dear Ms. Frances,

Thank you for the opportunity to comment on the NOSB-AWG Interim Final Report. The American Feed Industry Association (AFIA) is the national trade association for feed and pet food manufacturers, ingredient manufacturers and suppliers, equipment manufacturers and other firms which supply goods and services to the feed industry. AFIA's nearly 600 corporate members manufacture 75% of the nation's primary, commercial feed. Several AFIA members are engaged in the manufacture of organic feed and ingredients for terrestrial animals.

AFIA's Aquaculture Committee exists to inform members on opportunities within the aquaculture industry; assist in solving industry-related problems; educate the AFIA membership on the need for products, technologies and services of the aquaculture industry; and identify firms with aquaculture related activities. Its members are interested in seeing a reasonable and fair organic aquaculture program.

One of the primary difficulties of the NOSB-AWG report for aquatic animals is that it encompasses a collection of species that have several different characteristics. For example finfish, crustaceans, shellfish, and plants, and it has a resulting array of requirements for husbandry, handling, slaughter, health care and nutrition. Therefore, the standards can neither be too specific in an attempt to answer absolutely all questions for existing or emerging species, nor so general that an accredited organic certifier has little "specifics" upon which to anchor a workable program for the client.

We believe the NOSB-AWG has done an admirable job attempting to balance these various species and issues, but there are instances when we believe the details are too limited.

For example, there are questions, such as, who will decide the appropriate stocking densities for a species or an appropriate level of fish meal and fish oil in a feed formula? We conclude that it is likely to be the certification agent working in consort with a producer. However, the overriding principle they need to consider is the health of the animal, as it is the most clear, convincing evidence that a desired protocol has been met. Neither too much "of something" nor

too little, whether it be a nutrient requirement or a stocking density, should adversely affect the health of the animal. This is particularly relevant in an organic model considering that the health of an animal, and their environs, which is the most likely method, will promote homeostasis, minimize disease challenges and eliminate other adverse grow-out conditions.

Therefore, do the proposed standards effectively grant or delegate authority to the appropriate parties to make these assessments and resulting decisions? In many cases we understand that these details are, in fact, left to the relationship between certifier and producer. But, of course, there needs to be some consistency between a trout producer in Idaho and one in North Carolina. Are there enough directions within the standards to ensure this consistency? Can two independent certifiers, for example, arrive at similar conclusions governing a common species? This is the primary question the NOSB needs to ask concerning the various issues addressed in the proposed standard.

We hope that these comments are helpful to the NOSB in its development of standards for aquaculture products. We fully support the development of a reasonable and viable set of standards for this group of animals that have not, as yet, been able to enjoy participation in USDA's organic program. We urge NOSB to consider aquatic animals separate and distinct from terrestrial animals and their organic standards.

Other countries have or are developing standards for organic aquaculture. We applaud and urge consistency with recommendations proposed in the NOSB-AWG report and these emerging international standards.

We appreciate your consideration of our comments.

Respectfully,



Richard Sellers, PAS  
Vice President, Feed Control & Nutrition

